

**Response to Comments Received**  
**NTP Fact Sheet: *DOE Shipping Activity***

<i><b>Reviewer/Organization</b></i>	<i><b>Comment</b></i>	<i><b>Response to Comment</b></i>
ATR Institute, UNM	<p>There are graphical representations for Radioactive and NonRadioactive Hazardous Materials Shipments; &amp; number by various carriers. Perhaps showing weight of total shipments and level of radioactivity of shipments would add to information.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, 1<sup>st</sup> Paragraph: Uranium compounds for use in manufacture of reactor fuel now handled by USEC, not DOE.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, 3<sup>rd</sup> Paragraph: The majority of DOE air shipments in the time period referenced were overnight express letters.</p> <p>3<sup>rd</sup> Page, Last Column, 1<sup>st</sup> Line: Radioactive materials used in manufacturing nuclear fuel are USEC shipments.</p> <p>3<sup>rd</sup> Page, Last Paragraph: Restructure sentence to read: "Shipments of radioactive materials travel between .....under standards set by the International Atomic Energy Agency."</p> <p>4<sup>th</sup> Page, 1<sup>st</sup> Line: The nuclear fuel mentioned is not DOE material.</p>	<p>Total weight added to text. Statement added that DOE ships about 75 percent of the total curies shipped in the United States.</p> <p>Agree. Have deleted the reference.</p> <p>This is true, but do not believe it is necessary to state this fact.</p> <p>Agree. Reference deleted.</p> <p>Agree.</p> <p>Agree. However, it is being shipped to DOE program.</p>
DOE, Richland Operations Office	General: 1 <sup>st</sup> Page, 3 <sup>rd</sup> Column, 1 <sup>st</sup> Paragraph, Last Sentence: Good	

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DOE/RL (cont'd.)	<p>1<sup>st</sup> Page, Last Paragraph, 1<sup>st</sup> Sentence: The 425,311 shipments are off-site shipments. You cannot say “ in commercial” because some on-site shipments are in commercial and they are entered into the database.</p> <p>2<sup>nd</sup> Page, 2<sup>nd</sup> Paragraph: Hazardous material definition is not consistent with DOT definition. This sentence should be moved to the front page.</p> <p>2<sup>nd</sup> Page, 2<sup>nd</sup> Column, 1<sup>st</sup> Paragraph: Delete last sentence.</p> <p>2<sup>nd</sup> Page, 2<sup>nd</sup> Column, 2<sup>nd</sup> Paragraph, 1<sup>st</sup> Sentence: Some DOE radiological material is not considered hazardous material as defined by DOT regulations.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, 2<sup>nd</sup> Paragraph: The number of SNF shipments should be provided. This is what the stakeholders are concerned with.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, 3<sup>rd</sup> Paragraph: “small vendor trucks, private trucks or parcel carriers” should be included under truck or bar graph on following page should be revised with other.</p> <p>4<sup>th</sup> Page, 2<sup>nd</sup> Paragraph, 1<sup>st</sup> Sentence: Change “and other hazardous materials” to “other hazardous waste”.</p> <p>In the next sentence, change “and other materials” and “hazardous chemicals” to read “and other waste” and “hazardous waste”. PCBs are not hazardous waste per RCRA.</p> <p>4<sup>th</sup> Page, Map: Add “GA Atomic” to Southern</p>	<p>Inserted “offsite”.</p> <p>Definition changed to reflect wording in 49 CFR 171.8. Placement of text is intended to lead into discussion of shipment numbers.</p> <p>Done.</p> <p>Sentence reworded to clarify.</p> <p>Agree.</p> <p>Agree. Words deleted from text.</p> <p>Not all are wastes. Some are special nuclear materials.</p> <p>Same comment as above.</p> <p>Deleted reference to PCBs.</p>

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DOE/RL (cont'd.)	California, Paducah to Kentucky, and Portsmouth to Ohio. Question Ames Lab.	Done. Ames Lab verified with DOE ETAS staff.
EM-76, DOE-HQ	1 <sup>st</sup> Page, 3 <sup>rd</sup> Column, 2 <sup>nd</sup> Paragraph: Validate the 500 billion shipment number against the new DOT data.	Contacted the DOT Bureau of Transportation Statistics. New total not available.
DOE Pittsburgh Naval Reactors Office	<p>1<sup>st</sup> Page, Photo: Why a picture of a truck in the grass ... Wrong subliminal message. Have a picture of a truck on a well paved ... roadway.</p> <p>1<sup>st</sup> Page, 3<sup>rd</sup> Column, 1<sup>st</sup> Paragraph: Rewrite from the middle of the first sentence as follows: “on data from most of DOE’s transportation activities for Fiscal Year (FY) 1997 and should be considered as a representation of DOE’s total shipping activity.”</p> <p>4<sup>th</sup> Page, 3<sup>rd</sup> Column, Last Sentence: Replace “DOE is subject to International” with “DOE is subject to applicable International”. Delete “packaging and”.</p>	<p>Photo cropped to show only truck.</p> <p>Agree, with minor word change: “on data from most DOE transportation activities...”</p> <p>Wording modified to be less restrictive. Deleted the words “packaging and transportation”.</p>
Association of American Railroads	<p>General: May want to point out that while 77% of shipments travel by air, it accounts for just 1.5% by weight. Conversely, while only 0.07 % of shipments travel by rail, it accounts for 14.2% by weight.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, “DOE Uses All Transport Modes”: Does “shipments” here mean all shipments or just radioactive material shipments or hazardous material shipments? I assumed all shipments.</p>	<p>Information added.</p> <p>It means all shipments.</p>
Contractor Traffic Managers Association  CTMA (cont'd.)	1 <sup>st</sup> Page, 2 <sup>nd</sup> Paragraph: The statement “Because all DOE facilities do not report to the system and some report only certain types of shipments...” will likely lead the audience to questions such as: “Why don’t all DOE facilities report to the system?” and “What types of shipments are not reported?” It may be better to simply state: “The	Agree.

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	<p>information in this fact sheet should be considered only a representation of DOE's total shipping activity." If further explanation is necessary, a statement could always be made to the effect that due to security concerns and sensitive matters, not all shipments are made public using the DOE computer database.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Paragraph: Paragraph seems to indicate the only nonradioactive hazardous material shipments DOE makes include the classes listed. This is not the case. Perhaps it would be better to state that "examples of nonradioactive hazardous materials shipments include" and then list several classes.</p> <p>4<sup>th</sup> Page, Map: Map indicates Fernald is located about 100 miles too far east. It looks like the location of the Piketon, Ohio plant has been mistakenly used for Fernald. Fernald site should be in the southwest corner of Ohio.</p> <p>4<sup>th</sup> Page, Summary: Change "materials transport" to "transportation of hazardous materials". Also suggest the last sentence in the summary be modified. It reads as if there are Tribal, State and local packaging and transportation regulations. Suggest the wording be changed to "DOE is subject to the International, Federal, Tribal, State and local regulations created for the protection of workers, the public, and the environment."</p>	<p>Agree.</p> <p>Map corrected.</p> <p>Agree.</p>

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DOE, Nevada Operations Office	<p>General: I especially liked the positive parts stressing power production, medical improvements, etc. We need to stress this type of thing.</p> <p>I believe the numbers are confusing to general public. Once a number is mentioned, it should be consistent throughout the fact sheet.</p> <p>1<sup>st</sup> Page, 3<sup>rd</sup> Column, Last Paragraph: Reference the “500 billion” shipments. Why not use overall haz shipments, “about 300 million” from Low-level radioactive waste fact sheet. Is the 5 billion inclusive of hazmat? We should use one set of figures and keep uniform through all fact sheets.</p> <p>1<sup>st</sup> Page, Last Paragraph, 4<sup>th</sup> Sentence: For clarification, insert “hazmat” after “Of the total DOE”.</p> <p>2<sup>nd</sup> Page, 2<sup>nd</sup> Paragraph: Add in here that 3.5 percent from front of fact sheet.</p> <p>In the same section, number paragraphs (2, 2.1 and 2.2) to clarify.</p> <p>2<sup>nd</sup> Page, Pie Charts: Top chart adds up to 101 percent. Should add words to clarify.</p> <p>I don’t understand contents of this chart and how the chart reflects the verbiage. If it doesn’t, one should be changed to reflect the other.</p>	<p>Agree. Have added weights and percentages throughout the fact sheet.</p> <p>The 300 million refers only to hazardous material shipments.... the 500 billion refers to all shipments, including nonhazardous materials.</p> <p>Disagree. The number given is a percentage of the total number of shipments, not just hazmat shipments.</p> <p>Previous paragraph indicates that 96.5 are nonhazardous.</p> <p>Inconsistent with format of remainder of fact sheet.</p> <p>Spent Fuel and Nuclear Fuel slices both indicate <b>less than</b> 1 percent. Note has been added to graphic about rounding of percentages.</p> <p>Agree. Added text to tie charts and verbiage together.</p>

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DOE/NV (cont'd.)	<p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, 1<sup>st</sup> and 2<sup>nd</sup> Paragraphs: I know HLW isn't shipping, but should mention as "potential" future DOE shipments that could cause future percentages to increase.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, 5<sup>th</sup> Paragraph: Restructure paragraph, moving statement about 22 percent of shipments to end. First and last sentences say basically the same thing.</p> <p>3<sup>rd</sup> Page, Graph at top: Cannot read chart, but cannot see the numbers reflected in verbiage.</p>	<p>Indicated number of shipments is expected to increase.</p> <p>Deleted last sentence and reversed position of first two sentences of this paragraph.</p> <p>This chart is being reworked for clarification. Total number of shipments by mode (nonhazardous, radioactive, and nonradioactive hazardous) are shown in text.</p>

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DOE/NV Contractor	<p>General: Fact sheet indicates a 10 percent increase via highway from FY 95 and 96. Seems excessive. Stats should be reverified.</p> <p>Need a better picture of modes – not clear.</p> <p>1<sup>st</sup> Page, 2<sup>nd</sup> Column, 1<sup>st</sup> Line: Delete “also”.</p> <p>1<sup>st</sup> Page, 3<sup>rd</sup> Column, 1<sup>st</sup> Line: Delete first “the”.</p> <p>1<sup>st</sup> Page, Last Paragraph. Where is the 500 billion shipment figure from?</p> <p>2<sup>nd</sup> Page, 2<sup>nd</sup> Paragraph. Insert: Only 3.5 percent of DOE shipments are hazardous materials.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, 4<sup>th</sup> Paragraph: Majority of air shipments are express documents.</p> <p>4<sup>th</sup> Page, 2<sup>nd</sup> Column, 2<sup>nd</sup> Paragraph: Delete “the” from first line.</p> <p>In same sentence, delete “the” from “involving <b>the</b> production of electricity...”</p>	<p>FY 97 statistics replaced with 98 information, provided by ETAS staff in Oak Ridge.</p> <p>Commentor was working from a copy, printed photos are crisper.</p> <p>Done.</p> <p>Done.</p> <p>DOT.</p> <p>Preceding paragraph says 96.5 percent of shipments are Nonhazardous.</p> <p>Do not believe that level of detail necessary here.</p> <p>Disagree. Believe it improves flow of sentence.</p> <p>Done.</p>
State of Oregon	<p>General: I suggest eliminating this fact sheet. I don’t believe there is much interest in DOE’s nonhazardous, nonradioactive shipments. It seems as though this is an attempt to minimize DOE’s transportation activities.</p>	<p>Disagree. People have requested information on what DOE ships (including nonhazardous materials) and how numbers compare for different types of shipments.</p>
Pantex Program	<p>1<sup>st</sup> Page, 3<sup>rd</sup> Column, 1<sup>st</sup> Paragraph: Why aren’t all DOE facilities subject to same LLRW reporting requirements?</p>	<p>Reworded for clarification.</p>

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Council of State Governments, Mid-West	<p>1<sup>st</sup> Page, 2<sup>nd</sup> Column: Insert “materials” or “ones” after “radioactive” in ( ).</p> <p>1<sup>st</sup> Page, 3<sup>rd</sup> Column, sentence beginning “Because all DOE...”: This construction is wrong – it says, literally, that all DOE programs do not report to the shipping activity database (i.e., no programs report). It should read, Because not all DOE facilities report to the system...”</p> <p>1<sup>st</sup> Page, 3<sup>rd</sup> Column, 2<sup>nd</sup> Paragraph: The TEC/WG Communications topic group has debated the value of comparing DOE shipments to all U.S. shipments. By doing so, it appears that the Department is trying to minimize its role as a shipper. Here is what the fact sheet says: “DOE only ships 425,000 of the 500 billion shipments in the country, therefore it isn’t a big shipper.” One could use the same construction, using money as the item being compared: “Bill Gates only has \$40 billion of the trillions of dollars invested in this country, therefore he isn’t a rich man.” It doesn’t hold true for Bill and his fortune, so chances it doesn’t hold true for DOE and its shipments either.</p> <p>2<sup>nd</sup> Page, 3<sup>rd</sup> Column, Last Paragraph: There is a reference to “less than one-half of 1 percent of DOE shipments...” Does the 0.07 stand for .07%? If so, then shouldn’t the text say “less than one-tenth of 1 percent”? If not, where does the .05% come in?</p>	<p>Agree.</p> <p>Sentence deleted. See response to CTMA comment on same subject.</p> <p>Disagree. See response to Oregon comment.</p> <p>Agree.</p>



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Council of State Governments, Mid-West (cont'd.)	3 <sup>rd</sup> Page, Graph: The x-axis appears to go with the totals, airplane, and truck columns, but not with train or barge. In fact, the 1 train shipment of nonrad hazmat registers as great as the 22 barge shipments of radmat. The graph needs to be redesigned if all columns are to use the same axis. Perhaps removing the central portion – 100,000-300,000 – and showing the split would work.	Graph reconfigured.
Western Governors' Association	<p>General: Much useful information contained in this fact sheet, however:</p> <ul style="list-style-type: none"> <li>• It would be better to use data averaged over a 5-10 year period to provide a more accurate representation of DOE shipping activity (vs. a 1-year snapshot).</li> <li>• When discussion "Radioactive Materials," you need to include data on concentration/activity of the material shipped (i.e., small volume vs. many curies in comparison to other shippers nationally).</li> </ul>	<p>Will consider for future revision.</p> <p>Agree. Included a statement on percentage of curies shipped by DOE in comparison with total national shipments.</p>

NOTES:

- "No Comment" responses were received from: Indiana SEMA, Connecticut DEP/CRCPD, Nevada State Rail Safety Program Managers, State of Colorado, IAFC.